

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

TIG Insurance Company, )  
Plaintiff, )  
v. ) Case No.  
Global Reinsurance Corporation of )  
America, )  
Defendant. )

AFFIDAVIT OF PETER MORONE

STATE OF NEW YORK )  
 ) SS  
COUNTY OF NEW YORK )

I, PETER MORONE, upon personal knowledge and belief know these facts to be true,  
hereby under oath depose and state the following:

1. I am over the age of 21 and I am competent to testify to the matters set forth herein.
2. I am employed by GLOBAL Reinsurance Corporation of America, f/k/a Gerling Global Reinsurance Corporation of America ("GLOBAL").
3. My current job title at GLOBAL is Vice-President.
4. GLOBAL is a corporation that is incorporated in the State of New York.
5. GLOBAL has its principal place of business in the State of New York.
6. GLOBAL underwrites no risks in Illinois.
7. GLOBAL has no business offices in Illinois.
8. GLOBAL has no employees in Illinois.
9. GLOBAL owns no property in Illinois.

10. GLOBAL has no bank accounts in Illinois.
11. GLOBAL stores no documents in Illinois.
12. The underwriters who participated in the drafting of the reinsurance contracts at issue in this case are not employed by GLOBAL.

13. To the best of my knowledge, none of the former GLOBAL underwriters who participated in the drafting of the reinsurance contracts at issue in this case reside in Illinois.

14. Thomas G. Devine is a former GLOBAL underwriter. Mr. Devine participated in the drafting of the reinsurance contracts at issue in this case. After investigation, I have learned that his last known address is 55 Madison Avenue, Morristown, New Jersey.

I declare under penalty of perjury under the laws of the States of New York and Illinois that the foregoing affidavit is true and correct to the best of my knowledge.

**FURTHER AFFIANT SAYETH NOT.**

*Peter Morone*  
\_\_\_\_\_  
PETER MORONE

Subscribed and sworn to before  
me this 21st day of January, 2008

*184*

*Maria Saitta-Leahy*  
Notary Public

My commission expires: *January 14, 2010*

244142v1

MARIA SAITTA-LEAHY  
NOTARY PUBLIC, State of New York  
No. 43-4944093  
Qualified in Richmond County  
Certificate Filed in New York County  
Commission Expires Nov. 14, 2010